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*Counsel for Defendant Meta Platforms, Inc.*  
*(formerly known as Facebook, Inc.)*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

DZ RESERVE, and CAIN MAXWELL  
(d/b/a MAX MARTIALIS), individually and  
on  
behalf of all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:18-cv-04978 JD

**DEFENDANT META PLATFORMS,  
INC.'S ADMINISTRATIVE MOTION  
TO SHORTEN TIME FOR BRIEFING  
AND HEARING ON ITS MOTION TO  
ENFORCE CLASS COUNSEL'S  
ETHICAL OBLIGATIONS**

**[FILED PURSUANT TO CIVIL L.R. 6-3]**

Judge: Hon. James Donato

Pursuant to Northern District of California Local Rule 6-3, Defendant Meta Platforms, Inc. (“Meta”) respectfully moves the Court to shorten the time for the briefing and hearing schedule on Meta’s Motion to Enforce Class Counsel’s Ethical Obligations (“Motion to Enforce”), filed concurrently herewith (Dkt. No. 525). Meta proposes the following expedited schedule to resolve Meta’s Motion to Enforce: Plaintiffs’ opposition to the Motion to Enforce be filed no later than October 8, 2025, any reply be filed no later than October 10, 2025, and the motion be resolved outside the presence of the jury on Tuesday, October 14, 2025, if trial has commenced by that day, or Thursday, October 16, if trial has not yet started.

The Court may grant a motion to shorten time where the moving party “[i]dentifies the substantial harm or prejudice that would occur if the Court did not change the time.” Civ. L. R. 6-3(a)(3). Trial in this case is scheduled to begin on October 14, 2025. The Motion to Enforce concerns whether Plaintiffs must inform certain employees and principals of class members—each of whom submitted declarations in support of Meta at the class certification stage that bear on critical elements of the fraud claims set for trial, *see* Dkt. Nos. 296-1, 296-2, 296-3, 296-6, 296-9, 296-10—of Meta’s interest in calling them as witnesses at trial. The parties have been unable to resolve the issue, necessitating this motion. If the Motion to Enforce were decided on the routine timeline, the motion would not be decided before the start of trial, and Meta would therefore be unable to call these witnesses at trial. In other words, Meta would effectively be denied relief solely by virtue of the passage of time, prejudicing its ability to present a complete defense. *Cf. Noble v. Kiewit Pac. Co.*, 2008 WL 413754, at \*1 (N.D. Cal. Feb. 13, 2008) (granting motion to shorten time in which to hear motion to expedite deposition where party may otherwise be unable to get testimony of “key witness”). Accordingly, an expedited schedule is appropriate.

1 Dated: October 2, 2025

Respectfully submitted,

2 **LATHAM & WATKINS LLP**

3 /s/ Andrew B. Clubok

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